

ORIGINAL

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE:) Chapter 11
)
W.R. Grace & Co., et al.,) Case No. 01-1139 (MFW) through
) Case No. 01-1200 (MFW)
Debtors.)
) (Jointly Administered)

**NOTICE OF APPEARANCE, REQUEST FOR MATRIX ENTRY
AND REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS**

TO: Clerk of the Court
United States Bankruptcy Court
District of Delaware
824 Market Street
Wilmington, DE 19801

FILED
2001 APR 17 AM 9:51
CLERK
U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

Please enter the appearance of Francis A. Monaco, Jr., Esquire, of the firm of Walsh, Monzack and Monaco, P.A., as counsel for Zhagrus Environmental, Inc. ("Zhagrus"). Zhagrus is a party in interest and, pursuant to the Bankruptcy Rules and Section 1109(b) of the Bankruptcy Code, hereby requests that all notices given or required to be given in these cases be given to and served upon:

**Francis A. Monaco, Jr., Esquire
Walsh, Monzack and Monaco, P.A.
1201 N. Orange Street, Suite 400
P.O. Box 2031
Wilmington, Delaware 19899-2031
(302) 656-8162 (Tel)
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fmonaco@walmon.com (E-mail)**

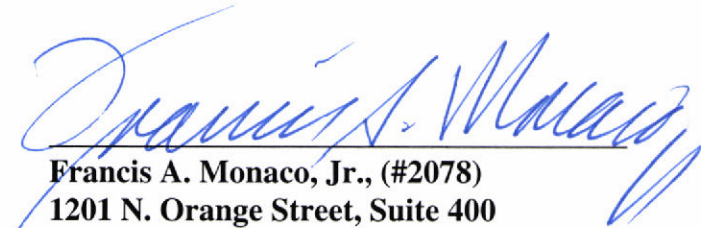
Please take further notice that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices referred to in the Bankruptcy Rules but also includes, without limitation, notices of any application, motion, petition, pleading, request,

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complaint, or demand, whether formal or informal, filed in these chapter 11 cases.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of Zhagrus' right: (1) to have final orders in noncore matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) or any other rights, claims, actions, defenses, setoffs, or recoupments to which Zhagrus is or may be entitled, in law or in equity, all of which Zhagrus expressly reserves.

WALSH, MONZACK AND MONACO, P.A.


Francis A. Monaco, Jr., (#2078)
1201 N. Orange Street, Suite 400
Wilmington, DE 19899-2031
(302) 656-8162

Attorney for Zhagrus Environmental, Inc.

Dated: April 16, 2001

CERTIFICATE OF SERVICE

I, Kristie L. Dalton, certify that I am not less than 18 years of age, and that service of the foregoing document was made on April 17, 2001, upon:

Laura Davis Jones, Esq.
Pachulski, Stang, Ziehl, Young and Jones
919 N. Market Street, 16th Floor
Wilmington, DE 19801

James H.M. Sprayregen, Esquire
Kirkland & Ellis
200 E. Randolph Street
Chicago, IL 60601

Under penalty of perjury, I declare that the foregoing is true and correct.

04/17/01
Date

Kristie L. Dalton
Kristie L. Dalton

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